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ROBERT “SONNY” WOOD and
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT “SONNY” WOOD, an individual;
ACCESS MEDICAL, LLC, a Delaware limited
liability company,

Plaintiff,

vs.

NAUTILUS INSURANCE COMPANY, an Arizona
corporation; and DOES I through X, inclusive; and
ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No.: 2:17-cv-02393-MMD-VCF

JOINT STIPULATION AND
~~PROPOSED~~ ORDER FOR
EXTENSION OF JOINT PRETRIAL
ORDER DEADLINE (SECOND
REQUEST)

On March 22, 2022, the Court entered a minute order referring the case to Magistrate Judge Daniel J. Albregts to conduct a settlement conference (the “Order”). ECF No. 316. In the Order, the Court further stated that “[i]f the parties do not settle, the Joint Pretrial Order is due within 30



1 days of the date the settlement conference is held.” *Id.* Pursuant to ECF No. 317, the Court
2 scheduled a mandatory remote settlement conference for Monday, June 6, 2022, at 10:00 a.m. (the
3 “Settlement Conference”). Based on the Order, the original deadline for the parties to file the Joint
4 Pretrial Order was July 6, 2022.

5 The parties, along with their counsel, participated in the Settlement Conference with
6 Magistrate Judge Daniel J. Albregts. As discussed in the Court’s minutes of proceedings, offers
7 and counteroffers were exchanged at the Settlement Conference; however, “[a] settlement was not
8 reached.” ECF No. 319. After the Settlement Conference, the Court recused itself and directed
9 the clerk of court to randomly reassign another magistrate judge to this case. *Id.* The case was
10 randomly reassigned to Magistrate Judge Cam Ferenbach for all further proceedings. ECF No.
11 320.

12 This Court previously granted the parties an extension until July 27, 2022, to file the Joint
13 Pretrial Order. ECF 323. In the time since the Settlement Conference, and the granting of the first
14 extension, counsel for the parties have diligently conferred regarding, and began preparing, the
15 Joint Pretrial Order consistent with the numerous requirements of Local Rule 16-3(b). Specifically,
16 the current draft of the document circulated between the parties is approximately 55 pages long.

17 However, the parties are still in the process of conferring about, preparing, and finalizing
18 the Joint Pretrial Order for the Court. Further, given the volume of documents involved in this
19 matter, addressing objections, duplicative documents, and agreements as to evidence has been time
20 consuming.

21 To provide the parties enough time to further confer regarding the matters required by
22 Local Rule 16-3(b) and to adequately prepare the Joint Pretrial Order, the parties hereby stipulate
23 – and respectfully request that the Court order – to continue the deadline to file the Joint Pretrial
24 Order to August 12, 2022.

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This is the second stipulation for extension of time to file the Joint Pretrial Order. No other deadlines will be affected by this continuance. The parties are committed to completing and filing the Joint Pretrial Order by the date requested herein. Although this is the second request, the parties have been working diligently and amicably on the lengthy document.

IT IS SO STIPULATED.

DATED: July 27, 2022

THE SCHNITZER LAW FIRM

By: /s/ Jordan P. Schnitzer, Esq.

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*Attorneys for Defendants ACCESS MEDICAL, LLC and
ROBERT CLARK WOOD, II*

DATED: July 27, 2022

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By: /s/ Samuel E. Lipsitz, Esq.

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NAUTILUS INSURANCE COMPANY

IT IS SO ORDERED

Dated: 7-27-2022

Magistrate Judge Cam Ferenbach

